ATOFINA

ATOFINA Chemicals, Inc.

RECEIVED
2002 SEP 23 A 9:22
DIVISION OF WASTE MGMT
HAZARDOUS WASTE BRANCH

September 19, 2002

Mr. Michael V. Welch P.E.
Hazardous Waste Branch
Division of Waste Management
14 Reilly Road
Frankfort, Ky 40601

Subject: Minor Part B Permit Modification
Addition of fixed cover to hydropulper (TK-5220)
ATOFINA Chemicals, Inc.
Carrollton, Kentucky
EPA I.D. #KYD-006-373-922

Dear Mr. Welch,

ATOFINA Chemicals, Inc. would like to request a minor modification for the addition of a fixed cover and charging hopper to the hydropulper (HY-5220), an existing piece of equipment in area B-52. This project is part of a negotiated consent order between ATOFINA Chemicals, Inc. and the United States of America (Section 15 B). This modification may be performed under 401 KAR 38:040 Section 3 (3).

This minor modification submittal contains the following information:

- A detailed description of the modification.
- A copy of the pertinent pages of the negotiated consent order related to the Hydropulper.
- Copies of pertinent pages from the Part A Permit and Part B Permit Renewal related to the Hydropulper.

A check for $300 for the modification processing fee will be forwarded to your office on Friday, September 20, 2002. ATOFINA Chemicals, Inc. is requesting a written approval of this request for minor modification. Upon receiving written approval of the modification, ATOFINA Chemicals, Inc. will proceed with the project per the timeline discussed in the negotiated consent order. If you have any questions concerning this request, please contact me at (502) 732-4411 ext. 296.

Sincerely,

James W. Stamm

James W. Stamm
HES Manager
ATOFINA Chemicals, Inc.
Carrollton Plant

ATOFINA Chemicals, Inc.
2000 Market Street
Philadelphia, PA 19103-3222
215-419-7000
www.AtofinaChemicals.com

ATOFINA Chemicals, Inc.
Carrollton Plant
Carrollton, Carroll Count, Kentucky
EPA I.D. #KYD-006-373-922

Permit Modification #6

September 19, 2002

1. Pursuant to the Consent Order Agreement (No. 01-7087) filed in the United States District Court for the Eastern District of Pennsylvania, ATOFINA will add a fixed cover with a hopper to enclose the hydropulper (HY-5220) located in area B-52. The fixed cover/hopper will allow solid and liquid charging of waste to the hydropulper and have the ability to close and provide a seal to the hydropulper. A slide gate or equivalent device will provide a seal between the hopper and the hydropulper during processing of waste. After the charging of waste, the hydropulper will be vented to an thermal oxidizer or similar air pollution control device meeting at least 95% removal efficiency during times when waste is present in the hydropulper. A bridge crane structure will be raised to accommodate the fixed cover and hopper. A new platform level will be added to provide a work surface for the addition of waste to the hydropulper.

Consent Order references to the Hydropulper

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CIVIL ACTION
	:	
v.	:	
	:	
ATOFINA CHEMICALS, INC.	:	No. 01-7087

MEMORANDUM AND ORDER

Norma L. Shapiro, S.J. August 5, 2002

The United States, filing a complaint against Atofina Chemicals, Inc. ("Atofina") on behalf of the Environmental Protection Agency ("EPA"), alleged Atofina failed to comply with multiple environmental statutes and regulations at six of its chemical processing facilities. The parties having negotiated a settlement, the United States published a proposed consent decree for public comment for thirty days as required by 28 C.F.R. § 50.7. A non-party, the LeMoyne Community Advisory Panel ("LCAP"), a community group allegedly affected by Atofina's wrongdoing, made the only objections. The United States now moves for entry of the consent decree.

The United States' Motion for Entry of a Consent Decree requires the court to evaluate if the proposed settlement fairly, adequately, and reasonably serves the public interest. The court has concerns about that portion of the consent decree objected to by LCAP, the "Supplemental Environmental Project" provision, but

NS

UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ATOFINA CHEMICALS, INC.,

Defendant.

CIVIL ACTION NO. 01cv7087

FILED

DEC 17 2001

MICHAEL E. KUNZ, Clerk

CONSENT DECREE

the KPDES permit incorporating the continuous pH monitoring requirement, the Company shall implement monitoring of the pH of the wastewater discharged from Calvert City Outfall 001 as required by the modified KPDES Permit No. KY0003603 and shall report the results of the monitoring and sampling to KDEP with the discharge monitoring reports as required by the modified KPDES Permit No. KY0003603. The Company shall install the continuous monitor at the nearest accessible point after final treatment, but after contribution of all wastestreams and prior to actual discharge or mixing with receiving waters. The Company shall calibrate and maintain its continuous monitor device in accordance with the requirements of EPA Method 150.2 "pH, Continuous Monitoring (Electrometric)."

15. **Carrollton, Kentucky**

A. **Clean Water Act – Representative pH Monitoring:**

No later than one hundred eighty (180) days after the Date of Entry of the Consent Decree, the Company shall apply to KDEP for a modification of the pH monitoring and reporting requirements of wastewater discharged from Outfall 001 of KPDES Permit No. KY0001431 from the once a week grab sample currently required by its KPDES permit to pH monitoring on a continuous basis as required by the modified permit. After the issuance of the modification of the KPDES permit incorporating the continuous pH monitoring requirement, the Company shall implement monitoring of the pH of the wastewater discharged from Carrollton Outfall 001 as required by the modified KPDES Permit No. KY0001431 and shall report the results of the monitoring and sampling to KDEP with the discharge monitoring reports as required by the modified KPDES Permit No. KY0001431. The Company shall install the continuous monitor at Outfall 001's Parshall flume. The Company shall calibrate and maintain its continuous monitor device in accordance with the requirements of EPA Method 150.2 "pH, Continuous Monitoring (Electrometric)."

B. **Resource Conservation and Recovery Act – Hydropulper:**

1. The Company shall add a fixed cover with a hopper to enclose the hydropulper. This hopper will have a discharge capability sufficient to pass solid and liquid materials with the

ability to reliably close after the discharge and provide a seal to the hydropulper. A slide gate or equivalent device will provide the seal between the hopper and the hydropulper during processing and such slide gate or equivalent device will be in an open position only during the charging of the tank. At all other times, as required in 40 C.F.R. Parts 264/265, Subpart CC, the slide gate to the hydropulper will be kept closed during the processing of hazardous waste. This hopper will be located to allow room for a hatch that may be used to inspect and/or sample the contents of the hydropulper, and for rinsing, cleaning and removing debris from the hydropulper. The hydropulper will be vented to an activated carbon canister. The bridge crane structure will be raised to provide additional head room. A new platform level will be added to provide a work area for transfer of the solids into the hydropulper.

2. No later than forty-five (45) days after the Date of Entry, the Company shall submit a permit application to the KDAQ and/or KDWM to modify the existing hydropulper. The Company shall commence construction no later than sixty (60) days after the date of receipt of all necessary permits, and shall complete construction and commence operation of the modified hydropulper within one hundred and eighty (180) days from commencement of construction.

16. **Houston, TX**

A. The Company shall undertake the following measures concerning its discharges of storm water:

B. Storm Water Management Improvement Plan to assure storm water discharges are in compliance with the NPDES permitting program.

1. The Company shall implement a Storm Water Management Improvement Plan ("SWMIP"), as set forth in this paragraph, to improve storm water management at the Houston Facility. To improve stormwater management at the Houston Facility and to ensure that all storm water discharges are in accordance with NPDES permit requirements including maintaining and implementing a Storm Water Pollution Prevention Plan (SWPPP) and associated Best Management Practices, the SWMIP is based upon managing a five year/24 hour storm event of approximately 7.25" of rainfall. The Company shall manage all storm water at its Houston

Part A Permit references to the Hydropulper

Please type or print clearly in ink (Do not use pencil) DEP-7058A (July 1997)

Kentucky Natural Resources and Environmental Protection Cabinet
Department for Environmental Protection
Division of Waste Management
14 Reilly Road - Frankfort, Kentucky 40601

DO NOT WRITE IN THIS SPACE

Part A of the Kentucky Hazardous Waste Permit Application

Facility's EPA ID No.	K	Y	D	0	0	6	3	7	3	9	2	2

Fee Submitted $ FOR OFFICIAL USE ONLY Receipt No. Date:

FIRST SUBMITTAL *(see INSTRUCTIONS)* REVISION PAGE 1 OF 5

X RENEWAL

1. Name of Facility: ATOFINA Chemicals, Inc.

2. Location of Facility: 2316 Highland Ave

   City: Carrollton State: KY Zip Code: 41008

3. County: Carroll *See INSTRUCTIONS:* Latitude: 38 40' 49" Longitude: 85 8' 58"

4. Name of Land Owner: *See INSTRUCTIONS:* _____

   Legal status of Land Owner: Federal (F) State (S) County (C) Indian (I)

   Municipal (M) District (D) XPrivate (P)

   Other (O) specify: _____

   Land Owner's Mailing Address: same as above

   City: _____ State: _____ Zip Code: _____

   Facility Land Owner's Telephone Number: ( ) _____

5. Existing Facilities, provide the date operation began or construction commenced: 1959 (Month, Day, Year)

   New Facilities, provide the date operation is expected to begin: _____ (Month, Day, Year)

6. Facility Mailing Address: same as above

   City: _____ State: _____ Zip Code: _____

7. Facility Contact Person: Steve Bader

   Title: Environmental Manager Phone Number: (502) 732-4411

   Facility Contact Person may be reached at Mailing Address xLocation Address Other Specify: _____

   Street Address: same as above

   City: _____ State: _____ Zip Code: _____

Facility's EPA ID Number

K	Y	D	0	0	6	3	7	3	9	2	2

8. Name of Facility Operator: *See INSTRUCTIONS:* ATOFINA Chemicals, Inc.

Type of Ownerr: Federal (F) State (S) County (C) Indian (I)

Municipal (M) District (D) XPrivate (P)

Other (O) specify: _____

Operator's Mailing Address: same as above

City: _____ State: _____ Zip Code: _____

Facility Operator's Telephone Number: ( ) _____

New Operator Assumed Responsibility for Facility on this Date: _____
(Month, Day, Year)

9. Name of Facility Owner: *See INSTRUCTIONS:* ATOFINA Chemicals Inc.

Legal status of Land Owner: Federal (F) State (S) County (C) Indian (I)

Municipal (M) District (D) X Private (P)

Other (O) specify:

_____

Owner's Mailing Address: 2000 Market Street

City: Philadelphia State: PA Zip Code: 19103

Facility Owner's Telephone Number: (215) 419-7000

New Operator Assumed Responsibility for Facility on this Date: _____
(Month, Day, Year)

10. SIC Codes: (1) 2819 (2) 2869 (3) 2899 (4) 2879

Briefly describe the type of business conducted at this site: Batch Specialty Chemicals

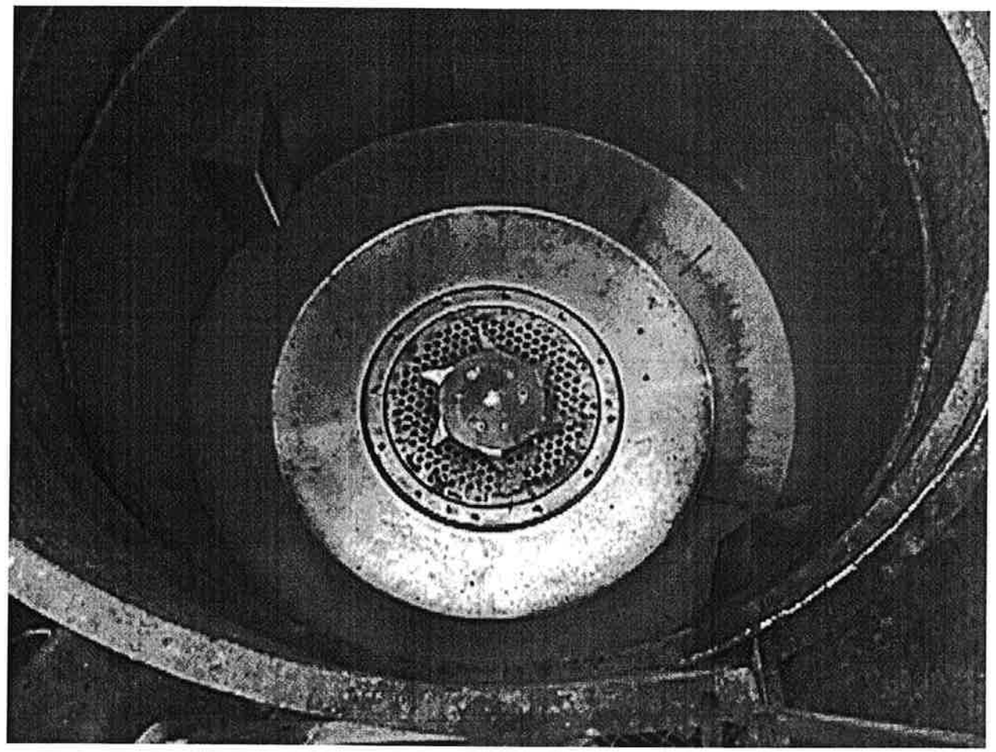
PAGE 3 OF 5

Facility's EPA ID Number: KYD006373922

11. PROCESS DESCRIPTION. *See Instructions*

Commercial Indicator	Unique Unit or Group Name	Legal Status Code	Process Codes	Process Design Capacity Of All Units Listed Under This Name	Unit of Measure	Number Of Individual Units In This Process	Operating Status Code	Description Of Process
2	B-52 Tank Farm	PI	S02	97,942	G	6	OP	Storage Tank System
2	B-65 Pad	PI	S01	142,890	G	1	OP	Container Storage
2	B-64 Pad	PI	S01	37,400	G	1	OP	Container Storage
2	Hydropulper	PI	T01	750	G	1	OP	Tank for Batch Mixing
2	Tin Recovery System (TRS)	PI	T03	2.5	D	1	OP	Incinerator for Tin Recovery
2	B-52 Tank Farm	PI	T01	97,942	G	6	OP	Tank for Mixing

Part B Permit Renewal references to the Hydropulper



Hydropulper looking in 8/1/00

Spill and Leak Analysis

As explained in Section D-1b(5), spills, leaks, and accumulated liquids are analyzed for pH and total organic carbon to determine if they are hazardous. The pH must be between 2 and 12.5 and the total organic carbon must be less than background which has been set a 120 ppm.

Mixing Waste Requirements

When containerized wastes are mixed with other waste in containers, the specific protocol determined during the compatibility analysis is followed.

The rationale followed for putting waste into empty but unwashed containers is that only similar waste groups reuse unwashed containers. Each container is clearly marked as to the waste compatibility type that can be stored in it.

Container Washing

Containers are washed in either the bermed truck unloading area where solvent is unloaded, an unused compartment of the pad, or inside Building B-52. The containers are first emptied to the extent possible. The containers are then rinsed with water. If the container held a "P" listed waste, the container is triple rinsed.

The rinseate from the drum washing activities are collected and sent to the onsite KPDES permitted wastewater treatment facility.

Precautions for Reactive Wastes

In addition to the precautions used for ignitable and incompatible wastes, reactive wastes are treated as follows:

- No mixing or blending of reactive wastes is performed on the container pads.
- Spills of reactive wastes are only put into clean containers or tanks.
- All mixing is performed by the specific protocol for the reactive waste and the mixture.

By these steps, toxic mists, dust, or gases are minimized and/or controlled as not to endanger health, cause risk of fire, or explosion.

<u>D-2 TANK SYSTEMS</u> 401 KAR 34:190 and 38:160

The following is an overview of the TRS process with respect to the storage and blending tanks and other treatment units. The TRS process has both a non-hazardous waste area and a hazardous waste area. All hazardous waste equipment and tanks are aboveground.

The location of tanks and other hazardous waste units are shown in **Figures D-2.1a and D-2.1b.** The hazardous waste tanks and equipment are listed below:

Hazardous Waste Equipment: Hydropulper (HY-5220)-a high speed mixer that is used for both hazardous and non-hazardous waste slurries.

Storage and Treatment Tanks (S01 & T01)

1. Slurry Feed Tanks (TK-5209 A&B & TK-5210)-a three tank fill and draw system; one tank is used to blend the slurry to the correct proportions while the other tank is used to feed the slurry to the TRS incinerator.

2. Solvent Feed Tanks (TK-5204 A&B)-a two tank fill and draw system; one tank is used to blend the solvent to the correct proportions while the other tank is used to feed solvent to the TRS incinerator.

3. Solvent Tank (TK-5203 A, B, & C)-a storage and blending tank (3 separate compartments) for solvents. Solvents are blended then pumped to the other solvent tanks.

Ancillary Equipment

1. Scrubber/Absorber (CO-5240) -a scrubber used to control HCL emissions from the incinerator.

2. Scrubber water sump (SU-5240) -a containment area and sump for the caustic scrubber and ancillary equipment (piping and pumps).

Pumps:

- TK-5203 A, B, and C include pumps PU-5203A and PU-5203B. These are carbon steel air diaphragm pumps.
- TK 5204 A and B include pumps PU-5204A, PU-5204B, and PU-5402C. These are carbon steel centrifugal pumps.
- TK-5209 A and B and TK-5210 include PU-5209A, PU-5209C, PU-5210A, and PU-5210B. These are carbon steel centrifugal pumps.
- HY-5220 include pumps PU-5220A and PU-5220B. These are carbon steel centrifugal pumps.

A manway is provided for inspection and maintenance procedure. These tanks are also equipped with 3 carbon canisters in parallel to control organic vapors (refer to information concerning TK-5209 A and B).

Secondary containment (see Figure D-2.4) is provided by the general hazardous waste management drainage area and the hazardous waste sump (SU-5220). Containment calculations are the same as those presented for tanks TK-5209 A&B (See Appendix D-2).

Hydropulper HY-5220

HY-5220 is a high speed mixing vessel that was installed in 1978. The hydropulper receives wastes on a batch basis to be processed mechanically. Non-solvent wastes are added to the hydropulper. These wastes can include, but are not limited to such items as, filter press muds from the wastewater treatment facility, recovery still pot bottoms, used filter papers, and miscellaneous solids. The hydropulper is manually filled to a point where 2 feet of freeboard remain. The agitator, which is in the bottom of the unit, is then initiated. This agitator blends the material into a homogeneous mixture. This mixture is then pumped to a slurry tank. Once the contents of the hydropulper are emptied, the sequence of manual filling the hydropulper, blending, and emptying is repeated. This process is continued until the slurry tank is almost filled. At this time the hydropulper is rinsed and the rinse water is pumped to the slurry tank.

The current age of the hydropulper is 21 years. The mixing capacity of the hydropulper is 750 gallons even though its total volume is equivalent to about 1500 gallons. **Table D-2.5** summarizes the design parameters of this treatment unit. The unit is a vessel with a lid that has a maximum height of liquids of 5ft. 7in. Overfilling controls include the presence of a TRS operator during loading. This tank is operated in batch mode.

Appendix D-3 contains a P&ID of the hydropulper (HY-5220). The secondary containment for HY-5220 is provided by the hazardous waste containment area structure and sumps (SU-5220). Containment calculations are the same as those presented for tanks TK-5209 A & B (see Appendix D-2).

TABLE D-2.5
HYDROPULPER HY-5220

Design:	
Identification Number A	25EM552-1
Design Code and Year	None, 1978
Current Age	21 years
Dimensions, inches	
Height	130"
Diameter, O.D.	84-3/8"
Capacity:	750 gallons (in mixing mode)
Material of Construction:	304 Stainless Steel
Installed Shell Thickness	0.375"sides, 0.50" bottom
Corrosion Allowance	0.275"sides, 0.40" bottom
Minimum Thickness for Structural Integrity	0.10"sides, 0.10" bottom
Seams	Welded
Operational:	
Material stored	Slurry
Specific gravity	0.9-1.3
Pressure	Atmospheric
Temperature	Ambient
Maximum height of liquids	5'7"
Feed System	*
Controls/Equipment:	
Pressure gauge	No
Temperature gauge	No
Nitrogen blanket	No
Pressure relief vent	No
Overfilling shut-off	No
Overfilling alarm	No
Secondary containment	Yes
Liner	No
Internal inspection	Yes

*The hydropulper is an open top treatment unit that has a secondary containment area consisting of the general hazardous waste management drainage area and the hazardous waste sump (SU-5220). A minimum of a 24 inch freeboard is maintained. HY-5220 is used only for mixing and does not store any wastes.

SLUDGE
PU-5212
D-5212-I-014

FE 2002
FI

B/F

HS 2001

TK-5220
AG-5220

PU-5220B

PU-5220A

PU-5220D

AG-5220A
AG-5220B
SU-5220

PU-5220E

SLURRY
PU-5210A/B
D-5210-I-014

SLURRY
PU-5209A/B
D-5209-I-014

WASTE WATER
TK-6712
D-6712-I-000

FILTER CAKE

SOLVENT
TK-5203
D-5203-I-014

ELECT STM

SLURRY
PU-5222A/B
D-5222-I-014

SLURRY
TK-5209B
D-5209-I-014

SLURRY
TK-5201
D-5201-I-014

SLURRY
TK-5210
D-5210-I-014

SLURRY
TK-5209A/B
D-5209-I-014

SLURRY
CL-5212
D-5212-I-014

SUMP

SLURRY
CL-5212
D-5212-I-014

SUMP PAD H20
PU-5230
D-5230-I-014

SLURRY
FI-5230
D-5230-I-014

TK-5210
D-5210-I-014

SUMP

LAST INST. NO'S. USED: 2002

REV.	MADE BY	APPD. BY	DATE	DESCRIPTION

elf atochem
ATO
Carrollton Plant
2316 Highland Avenue
Carrollton, KY 41008
(502) 732-4411

B-52 PIPING & INSTRUMENT DIAGRAM
TRS SLURRY SYM. HYDROPULPER/AGIT
(TK-5220)

DRAWN BY:	APPD. BY:	DATE
MAF	-	8/1/94

SCALE	DWG. No.	REV.
NONE	D-5220-I-014	0

MAR 11 1998

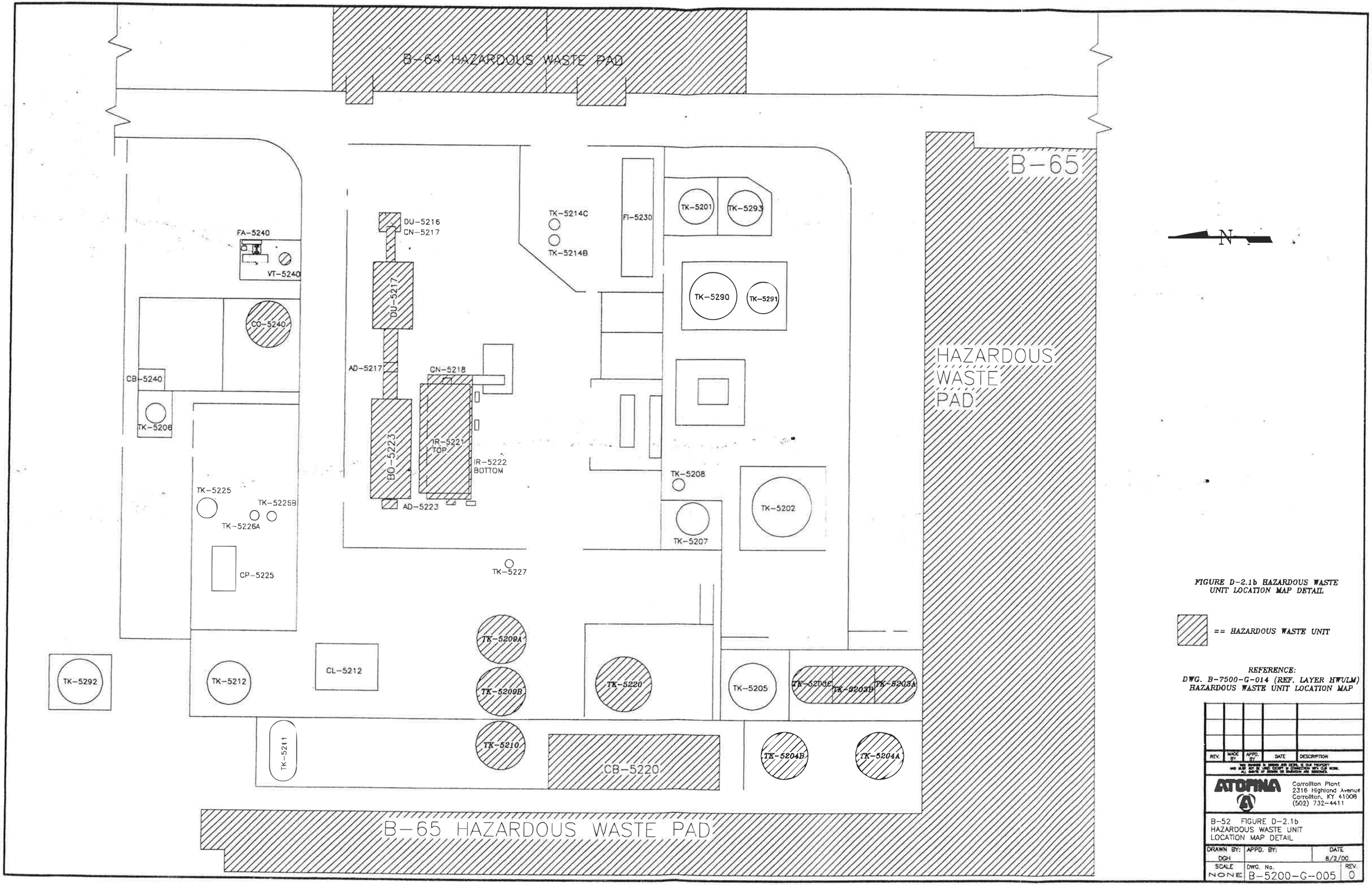


FIGURE D-2.1b HAZARDOUS WASTE UNIT LOCATION MAP DETAIL

== *HAZARDOUS WASTE UNIT*

REFERENCE:
DWG. B-7500-G-014 (REF. LAYER HWULM)
HAZARDOUS WASTE UNIT LOCATION MAP

REV.	MADE BY	APPD. BY	DATE	DESCRIPTION

THIS DRAWING IS BASED ARE DEPT. IS OUR PROPERTY AND MUST NOT BE LOANED COPIED IN CONNECTION WITH OUR WORK. ALL RIGHTS OF DESIGN OR INVENTION ARE RESERVED.

ATOFINA Chemicals, Inc.
Carrollton Plant
2316 Highland Avenue
Carrollton, KY 41008
(502) 732-4411

B-52 FIGURE D-2.1b
HAZARDOUS WASTE UNIT
LOCATION MAP DETAIL

DRAWN BY:	APPD. BY:	DATE
DGH		8/2/00
SCALE	DWG. No.	REV.
NONE	B-5200-G-005	0